

## UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*

Priority Mail Express bearing mailing label with tracking  
number EJ 864 801 947 US located at 3701 W  
Wendover Ave, Greensboro, North Carolina 27495

Case No. 1:21MJ329-1

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Priority Mail Express bearing mailing label with tracking number EJ 864 801 947 US located at 3701 W Wendover Ave, Greensboro, North Carolina 27495

located in the Middle District of North Carolina, there is now concealed *(identify the person or describe the property to be seized)*:

Unites States Currency

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. § 846	Conspiracy to violate Title 21 of the United States Code
21 U.S.C. § 841, 843(b)	Distribution and Possession with Intent to Distribute a Controlled Substance; Use of a Communication Facility to Facilitate Distribution of a Controlled Substance

The application is based on these facts:

See attached affidavit incorporated by reference herein

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days)* \_\_\_\_\_ is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Angela D. Pollard

*Applicant's signature*

Angela D. Pollard-Postal Inspector

*Printed name and title*

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: August 31, 2021 4:15 pm

City and state: Durham, North Carolina



Certified to be a true and  
correct copy of the original.  
John S. Brubaker, Clerk,  
U.S. District Court  
Middle District of North Carolina

By: Joe L. Webster

Deputy Clerk

Date: August 31, 2021

*Joe L. Webster*  
*Judge's signature*

Joe L. Webster, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT

The undersigned, being duly sworn, deposes and states:

I. Affiant's Background and Training

1. I, Angela D. Pollard, am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since 1999. I completed a fourteen-week basic training course at the USPIS Training Academy in Potomac, Maryland. I have received specialized training in Interview and Interrogations, Mail Theft Investigations, Prohibited Mailings Narcotics, Property and Evidence Handling Procedures, Workplace Violence Prevention, Field Legal Training, and Confidential Informant Training. Prior to starting the USPIS Training Academy, I was a law enforcement officer in the city of Fayetteville, North Carolina from 1989-1999. While employed for the City of Fayetteville, I received specialized training in Homicide Investigations, Narcotics Investigations, Sexual Assault Investigations, Field Training Officer training, in addition to numerous other trainings. I am currently assigned to the Prohibited Mail Narcotics Team in Greensboro, North Carolina, Charlotte Division, which is responsible for investigations of violations involving the United States Mail, including use of the U.S. Mail to transmit controlled substances, in violation of Title 21, United States Code, Sections 841 (a) and 843(b) and 846.

II. Information Regarding the Suspect Parcel

2. On August 30, 2021, a Priority Mail Express parcel with tracking number EJ 864 801 947 US (hereafter, "the Suspect Parcel") entered the mail stream in Cleveland, North Carolina 27013. The Suspect Parcel was addressed to "Jacqueline Amador Rodriguez, 1817 El Monte ave, Ceres, CA 95307."

3. On August 30, 2021, Postal Inspectors conducting an interdiction deemed the parcel as suspicious in nature. The Suspect Parcel was going to a source state commonly known for receiving the proceeds of narcotics transactions, the entire box was taped, the box had sixty dollars' in five-dollar stamps and had a name misspelled.

4. The Suspect Parcel is described as follows:

- A. Addressed to: "Jacqueline Amador Rodriguez, 1817 El Monte ave, Ceres, CA 95307"
- B. From: "Justin Bowles, 180 Hollifield Ct, Cleveland, NC"
- C. Size: approximately 12 ¼ inches by 12 ¼ inches by 6 inches
- D. Weight: 3 pounds 6 ounces
- E. Postage affixed: \$67.65
- F. Physical description: A white Priority Mail Express box with tracking number EJ 864 801 947 US.

5. On August 30, 2021, investigators attempted to verify the information provided on the Priority Mail label for the Suspect Parcel by using

law enforcement databases. USPIS was able to determine that the name of the recipient (Jacqueline Rodriguez (correct spelling) of the Suspect Parcel is associated with the address on the label for 1817 El Monte Avenue, Ceres, California 95307. The sender's address (180 Hollifield Court, Cleveland, North Carolina 27013) for the Suspect Parcel is a valid address; and the name "Justin Bowles is associated with the address. Justin Bowles has a conviction for possession of marijuana in June of 2019.

6. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and/or monetary payments related thereto commonly use fictitious and misspelled names and addresses in an attempt to avoid detection by law enforcement agencies. I am also aware, through training and experience that California is a source state for the distribution of narcotics and the receiving of the narcotic proceeds. I am also aware North Carolina is a known destination for controlled substance through the U.S. Mail and known for using the U. S. Mail for returning U. S. Currency to the initial sender to complete sales of narcotics.

7. I am also aware that people often use the U.S. Mail, specifically Priority Mail Express and Priority Mail, for the delivery of controlled substances and U. S. Currency for various reasons, some of which are listed below:

A. Items sent via Priority Mail Express, and Priority Mail are First-

Class Mail. Therefore, these items cannot be examined without a federal search warrant.

- B. Priority Mail Express, and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
- C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and provide the sender an opportunity to have some control as to the arrival of the mailed item.
- D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identities.
- E. Individuals use the U. S. Mail to send payment, often large sums of currency, for the controlled substances they have purchased. It is common for the currency to come into contact with the narcotics during drug transactions. It is further common for the currency to pick up the odor of narcotics when they come into contact. The narcotic odor in currency typically dissipates after approximately one week.

### III. Information Regarding the Use of a Drug Detecting Canine

8. On August 31, 2021, Drug K-9 Detective Justin Blanks of the Greensboro Police Department, and assigned to the Narcotics Division, was contacted regarding the Suspect Parcel. Detective Blanks and drug detecting Canine Kona (hereafter, "Kona") responded to the Greensboro Network Distribution Center in the Middle District of North Carolina.
9. The Suspect Parcel was placed in a lineup with four other parcels at the Greensboro Network Distribution Center, none of which contained a controlled substance. Kona walked among the parcels. Kona alerted only to the Suspect Parcel by sitting and staring at the Suspect Parcel, which was Kona's signal to indicate the scent of a controlled substance. The examination took place at 11:12 a.m. on August 31, 2021.
10. Detective Justin Blanks has been a sworn law enforcement officer for the past twenty years with the Greensboro Police Department, having completed Basic Law Enforcement Training (BLET) in May 2001. Detective Blanks is currently assigned as an Investigative Interdiction Detective on the Vice Squad in the Vice & Narcotics Division of the Greensboro Police Department and has worked narcotics investigations, specifically, since January 2006. In January 2014, Detective Blanks was selected to be a Narcotics Detection Dog Handler and was assigned K-9 Peaches, a five-year-old Yellow Labrador Retriever (retired-November 2017). In December 2017, Detective Blanks was again selected to be a

Narcotics Detection Dog Handler and assigned Kash, a German Shepard, a breed specifically selected for its keen senses and ability to be trained to detect the odor of controlled substances. In September 2019, Kash was retired from the Greensboro Police Department. In May of 2021, the Greensboro Police Department again selected Detective Blanks to be Narcotics Detection Dog Handler and was assigned Kona a German Shepard, a breed specifically selected for its keen senses and ability to be trained to detect the odor of controlled substances.

11. In addition to BLET, Detective Blanks has attended Police Law Institute, Street Crimes, Basic Narcotics Investigators course, Airport Narcotics Investigations, Introduction to Conspiracy Investigations, Highway and Rural Drug Investigations, Advanced Criminal Interdiction, Basic K-9/Detector Dog Training, High Risk Apprehensions, Bus Interdiction, Parcel Interdiction, Train Interdiction, and has attended numerous other seminars. Detective Blanks has been certified through the U.S. Drug Enforcement Administration's Operation JETWAY Training program to conduct all manner of Interdiction Investigations and has completed well over 500 hours of training with the majority of the training focusing on illegal narcotics throughout his career.
12. In addition to his current assignment, Detective Blanks has served the



department as a Patrol Officer, Police Training Officer, and as a street-level drug officer. Detective Blanks is a member of the North Carolina Narcotics Enforcement Officers Association, the International Narcotics Interdiction Association (INIA), and the International Police Working Dog Association. In 2003, Detective Blanks was recognized by the Greensboro Police Officers Association as Officer to the Year and has received Officer of the month on numerous occasions. In 2011, Detective Blanks' Investigative Interdiction Team was selected as the INIA International Interdiction Group of the Year.

13. Detective Blanks has conducted and assisted in narcotics investigations leading to the arrest and conviction of numerous narcotics traffickers in the State of North Carolina, 18<sup>th</sup> Prosecutorial District (Guilford County), and the United States District Court for the Middle District of North Carolina.
14. Detective Blanks has conducted and assisted in numerous narcotics investigations leading to the arrest and conviction of narcotics traffickers in the State of North Carolina, 18<sup>th</sup> Prosecutorial District and the United States Federal Court of the Middle District of North Carolina.
15. In May 2021, Kona was purchased from Ventosa Kennels, in Scotland Neck, NC, by the Greensboro Police Department. After undergoing several tests as to her suitability as a police work dog, Kona was accepted



by the Canine Division and began training in May 2021. Kona and Detective Blanks have completed together over 200 hours of basic canine detection training with a canine handler and Sergeant W. M. Symmes trainer who has over 14 years of experience in the Canine Division of the Greensboro Police Department.

16. Kona has demonstrated that she can reliably use her olfactory senses to locate the odor of controlled substances, which include heroin, cocaine, crack cocaine, marijuana, hashish, methamphetamine, and ecstasy. After successful completion of this training, Kona entered into service with the Greensboro Police Department, Vice & Narcotics Division as a narcotics detection K-9.
17. In training with the Greensboro Police Department, Kona was "imprinted" to detect the odor of cocaine, crack cocaine, marijuana, hash, methamphetamine, heroin, and ecstasy. At the beginning of training, the officers placed all seven substances in a hidden box, and Kona was rewarded with a toy when she correctly alerted. Then, the officers removed one substance at a time, and repeated the testing, until Kona could detect the presence of any of the substances individually.
18. On August 17, 2021, Blanks took Kona to Fayetteville, North Carolina, to undergo testing by the International Police Working Dog Association. Joseph Salisbury, of the Cumberland County Sheriff's Office,

administered the tests. Kona underwent three tests. The first was an open air field test where narcotic substances were hidden in four locations in a field or a parking lot. Kona successfully found the four hidden locations of controlled substances. The second test was of an interior room. Kona had to search five rooms, and alert to the presence of controlled substances. One of the rooms did not have any controlled substances and was blank. Kona successfully alerted to the four rooms that had controlled substances and did not alert to the blank room. The third test involved vehicles. Kona had to search eight school buses. Two of the buses had no drugs and were blank. Kona successfully alerted to the six buses that had controlled substances, and successfully did not alert on the two buses that were blank. Based on his one hundred percent successful rate of testing, Kona received certification from the International Police Working Dog Association. This certification is valid for 15 months from the date of issuance.

19. Kona is trained to give a "Passive Alert" after detecting the odor of narcotics. This "Passive Alert" consists of a physical reaction that ultimately ends in the dog coming to a sitting position or alternating looks between Detective Blanks and the point of narcotics. Kona also exhibits various mental and physical reactions that are noticeable to Detective Blanks, which include changes in his behavior such as

becoming possessive of the area, refusal to leave an area where the odor of narcotics is detected, and changes to his breathing rate and sniffing patterns.

20. Detective Blanks has successfully demonstrated the ability to properly deploy Kona and locate hidden narcotics. Kona has successfully detected narcotics that have been concealed in locations including the following: sealed packages, residential homes and outbuildings, automobiles, tractor-trailers, luggage, electrical components, and appliances, in the ground, and elsewhere.
21. On August 17, 2021, the K-9 detection team of Kona and Detective Blanks was certified as a K-9 detection team. From August 17, 2021 until present, Kona and Detective Blanks have located and seized no less than 104 pounds of methamphetamine, (as of usage report dated August 31, 2021).

#### IV. Conclusion Regarding Probable Cause

22. Based on the above facts, there is probable cause to believe that the Suspect Parcel contains United States Currency used in recent drug transactions, in violation of Title 21 United States Code Section 846. As such, I respectfully request that a Search Warrant be issued for the Suspect Parcel.

Respectfully submitted,

/s/ Angela D. Pollard

Angela D. Pollard

Postal Inspector

United States Postal Inspection Service

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 31st day of August 2021, at 4:15 p.m.



Joe L. Webster

United States Magistrate Judge

Middle District of North Carolina



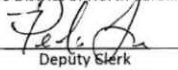
Certified to be a true and  
correct copy of the original.

John S. Brubaker, Clerk

U.S. District Court

Middle District of North Carolina

By:



Deputy Clerk

Date: August 31, 2021